

claims or defenses of any party to this action, nor reasonably calculated to lead to the discovery of admissible evidence. Defendants will construe the term “Document” to include everything contemplated by Rule 34(a)(1)(A) of the Federal Rules of Civil Procedure and by Rule 1001 of the Federal Rules of Evidence.

SPECIFIC OBJECTIONS AND RESPONSES

Subject to the foregoing General Objections and reservation of rights, as well as the specific objections set forth below, Defendants respond to Plaintiff’s Interrogatories as follows:

VENUE INTERROGATORY NO. 1:

As of the date of filing of the Original Complaint in this matter, please identify with specificity the location of any and all servers hosting all or part of the user data, data processing and source code for the Accused Instrumentalities on behalf of Defendant or any of its agents, or subsidiaries, such as, TikTok U.S. Data Security Inc. (“USDS”). Responsive location(s) include, but are not limited to, those servers hosting source code associated with any of the following: (i) TikTok Shop; (ii) TikTok advertising; (iii) TikTok Mobile Applications; (iv) TikTok database, (v) TikTok user profile (vi) TikTok user authentication (vii) TikTok data monetization; (viii) TikTok location data processing; and/or (ix) TikTok data storage.

<https://dgtlinfra.com/tiktok-data-centers-cloud-locations/>

Please contact counsel for Cellspin Soft if you have any trouble accessing these articles and they will provide you with a copy.

RESPONSE TO VENUE INTERROGATORY NO. 1:

In addition to and without limiting the foregoing General Objections, which are incorporated by reference as though fully set forth herein, Defendants object to this Interrogatory to the extent it seeks to require more of Defendants than any obligation imposed by law. Defendants object to this Interrogatory as overly broad, unduly burdensome, oppressive, and

disproportionate to the narrowed scope of venue discovery, particularly the issue of whether venue is clearly more convenient in this district. Defendants will only provide information relevant to the proper scope of venue discovery, which is information relevant to the accused functionality of the Accused Instrumentalities identified in Plaintiff's Preliminary Disclosure of Infringement Contentions served on March 11, 2024. Defendants further object to this Interrogatory because it calls for information beyond the relevant geographic scope of this matter.

Subject to and without waiving the foregoing General or Specific Objections, Defendants respond to this Interrogatory as follows:

The "servers hosting all or part of the user data, data processing and source code for the Accused Instrumentalities," as that phrase is understood by Defendants, are located in the following locations: [REDACTED]

[REDACTED]
[REDACTED].

Pursuant to Rule 33(d), Defendants refer to, and incorporate herein, the following document(s), which may contain information from which Cellspin may ascertain the requested information: BYTEDANCE-CS-0003740 – BYTEDANCE-CS-0003775.

VENUE INTERROGATORY NO. 2:

As of the date of filing of the Original Complaint in this matter, please identify with specificity each employee, including employees of subsidiary TikTok U.S. Data Security Inc. ("USDS"), contractor or individual who possesses knowledge relating to the design, engineering, testing, datacenter, database, data storage, operation, advertising, user data monetization, user authentication, user profile, location data processing and marketing of the Accused Instrumentalities in the United States. For each such individual, please provide:

- (i) the name of each such individual;

- (ii) the city of residence for each such individual;
- (iii) the location where each such individual performs their job tasks;
- (iv) the job title of each such individual;
- (iv) the job description for each such individual; and
- (v) a description of the relevant knowledge possessed by each such individual.

RESPONSE TO VENUE INTERROGATORY NO. 2:

In addition to and without limiting the foregoing General Objections, which are incorporated by reference as though fully set forth herein, Defendants object to this Interrogatory as overly broad and unduly burdensome, or disproportionate to the needs of the case, namely the limited venue issues before the Court. Defendants further object to this Interrogatory because it calls for information beyond the relevant geographic scope of this matter, namely the Eastern District of Texas. Defendants object to this Interrogatory because it is compound and contains multiple discrete subparts in violation of Fed. R. Civ. P. 33(a)(1).

Subject to and without waiving the foregoing General or Specific Objections, Defendants respond to this Interrogatory as follows:

Pursuant to Rule 33(d), Defendants refer to, and incorporate herein, the following document(s), which may contain information from which Cellspin may ascertain the requested information: BYTEDANCE-CS-0000001, BYTEDANCE-CS-0003637.

VENUE INTERROGATORY NO. 3:

As of the date of filing of the Original Complaint in this matter, please identify with specificity each employee, contractor or individual who possesses knowledge relating to the scope, purpose, and business activities associated with the so-called “Project Texas” and the TikTok whistleblower who went to U.S. Senator Josh Hawley (R-Mo.) as described in two separate independent articles, found at

<https://gizmodo.com/tiktok-whistleblower-congress-china-user-data-ban-1850213984>

and

<https://www.hawley.senate.gov/tiktok-whistleblower-hawley-demands-thorough-reviewexplosive-new-allegations>. Please contact counsel for Cellspin Soft if you have any trouble accessing these articles and they will provide you with a copy.

For each such individual, please provide:

- (i) the name of each such individual;
- (ii) the city of residence for each such individual;
- (iii) the location where each such individual performs their job tasks;
- (iv) the job title of each such individual;
- (iv) the job description for each such individual; and
- (v) a description of the relevant knowledge possessed by each such individual.

RESPONSE TO VENUE INTERROGATORY NO. 3:

In addition to and without limiting the foregoing General Objections, which are incorporated by reference as though fully set forth herein, Defendants object to this Interrogatory as overly broad and unduly burdensome, or disproportionate to the needs of the case, namely the limited venue issues before the Court. Defendants further object to this Interrogatory because it calls for information beyond the relevant geographic scope of this matter, namely the Eastern District of Texas.

Subject to and without waiving the foregoing General or Specific Objections, Defendants respond to this Interrogatory as follows:

Defendants identify Michelle Huang as an employee knowledgeable about “Project Texas.” Michelle Huang is a Bytedance Inc. employee and is based in New York.

Based on a reasonable investigation to date, Defendants are not aware of any employees who are knowledgeable about issues relating to the “TikTok whistleblower.”

VENUE INTERROGATORY NO. 4:

As of the date of filing of the Original Complaint in this matter, please identify with specificity, including location, any and all data centers, servers, electronic storage facilities,

physical storage facilities, TikTok Shop warehouses, or TikTok Shop customer return centers, which are either owned by You, or owned by an third party under Your supervision and control, or leased by You, and: (i) contain or otherwise store information relating to the Accused Instrumentalities; or (ii) is in any way involved in the selling, designing, engineering, testing, functionality and/or maintenance of the Accused Instrumentalities.

RESPONSE TO VENUE INTERROGATORY NO. 4:

In addition to and without limiting the foregoing General Objections, which are incorporated by reference as though fully set forth herein, Defendants object to this Interrogatory to the extent it seeks to require more of Defendants than any obligation imposed by law. Defendants object to this Interrogatory as overly broad, unduly burdensome, oppressive, and disproportionate to the narrowed scope of venue discovery, particularly the issue of whether venue is clearly more convenient in this district. Defendants will only provide information relevant to the proper scope of venue discovery, which is information relevant to the accused functionality of the Accused Instrumentalities identified in Plaintiff's Preliminary Disclosure of Infringement Contentions served on March 11, 2024. Defendants further object to this Interrogatory because it calls for information beyond the relevant geographic scope of this matter, namely the Eastern District of Texas. Defendants object to this Interrogatory because it is compound and contains multiple discrete subparts in violation of Fed. R. Civ. P. 33(a)(1).

Subject to and without waiving the foregoing General or Specific Objections, Defendants respond to this Interrogatory as follows:

Defendants incorporate by reference their response to Interrogatory No. 1.

Based on a reasonable investigation to date, Defendants are not aware of any data centers, servers, electronic storage facilities, physical facilities, TikTok Shop warehouses, or TikTok Shop

customer return centers concerning the Accused Instrumentalities that are located in the Eastern District of Texas. Pursuant to Rule 33(d), Defendants refer to, and incorporate herein, the following document(s), which may contain information from which Cellspin may ascertain the requested information: BYTEDANCE-CS-0000002 – BYTEDANCE-CS-0003604, BYTEDANCE-CS-0003740 – BYTEDANCE-CS-0003775.

VENUE INTERROGATORY NO. 5:

As of the date of filing of the Original Complaint in this matter, please identify with specificity each employee, contractor or individual who possesses knowledge relating to the business activities performed by Oracle in relation to the Accused Instrumentalities (including but not limited to: (i) activities relating to source code; (ii) activities relating to data storage; (iii) data center; (iv) oracle cloud; (v) user privacy; (vi) databases; (vii) mobile app signage; (viii) digital signature; (ix) security review process; (x) user authentication; (xi) user GPS location; (xii) user profile; (xiii) user ad recommendation (xiv) testing). For each such individual, please provide:

- (i) the name of each such individual;
- (ii) the city of residence for each such individual;
- (iii) the location where each such individual performs their job tasks;
- (iv) the job title of each such individual;
- (iv) the job description for each such individual; and
- (v) a description of the relevant knowledge possessed by each such individual.

RESPONSE TO VENUE INTERROGATORY NO. 5:

In addition to and without limiting the foregoing General Objections, which are incorporated by reference as though fully set forth herein, Defendants object to this Interrogatory to the extent it seeks to require more of Defendants than any obligation imposed by law. Defendants object to this Interrogatory as overly broad, unduly burdensome, oppressive, and disproportionate to the narrowed scope of venue discovery, particularly the issue of whether venue is clearly more convenient in this district. Defendants will only provide information relevant to the

proper scope of venue discovery, which is information relevant to the accused functionality of the Accused Instrumentalities identified in Plaintiff's Preliminary Disclosure of Infringement Contentions served on March 11, 2024. Defendants further object to this Interrogatory because it calls for information beyond the relevant geographic scope of this matter, namely the Eastern District of Texas. Defendants object to this Interrogatory to the extent it seeks information subject to the attorney-client privilege, attorney work product doctrine, third-party confidentiality obligations, or any other applicable privilege or protection. Defendants further object to this Interrogatory to the extent it seeks information duplicative of Interrogatory No. 2.

Subject to and without waiving the foregoing General or Specific Objections, Defendants respond to this Interrogatory as follows:

Defendants identify Michelle Huang as an employee knowledgeable about "Project Texas." Michelle Huang is a Bytedance Inc. employee and is based in New York.

VENUE INTERROGATORY NO. 6:

As of the date of filing of the Original Complaint in this matter, please describe with specificity the business activities performed by Oracle in relation to the Accused Instrumentalities (including but not limited to: (i) activities relating to source code; (ii) activities relating to data storage, (iii) activities relating to data center; (iv) activities relating to oracle cloud; (v) activities relating to user privacy; (vi) activities relating to databases; (vii) activities relating to mobile app signage; (viii) activities relating to digital signature of mobile apps; (ix) activities relating to security review process; (x) activities relating to user authentication; (xi) activities relating to user GPS location; (xii) activities relating to user profile; (xiii) activities relating to user ad recommendation (xiv) activities relating to testing), and include all persons with knowledge of such activities.

<https://www.lawfaremedia.org/article/project-texas-the-details-of-tiktok-s-plan-to-remainoperational-in-the-united-states>

Please contact counsel for Cellspin Soft if you have any trouble accessing these articles and they will provide you with a copy.

RESPONSE TO VENUE INTERROGATORY NO. 6:

In addition to and without limiting the foregoing General Objections, which are incorporated by reference as though fully set forth herein, Defendants object to this Interrogatory to the extent it seeks to require more of Defendants than any obligation imposed by law. Defendants object to this Interrogatory as overly broad, unduly burdensome, oppressive, and disproportionate to the narrowed scope of venue discovery, particularly the issue of whether venue is clearly more convenient in this district. Defendants will only provide information relevant to the proper scope of venue discovery, which is information relevant to the accused functionality of the Accused Instrumentalities identified in Plaintiff's Preliminary Disclosure of Infringement Contentions served on March 11, 2024. Defendants further object to this Interrogatory because it calls for information beyond the relevant geographic scope of this matter, namely the Eastern District of Texas. Defendants further object to this Interrogatory to the extent it seeks information duplicative of Interrogatory No. 5.

Subject to and without waiving the foregoing General or Specific Objections, Defendants respond to this Interrogatory as follows:

Pursuant to Rule 33(d), Defendants refer to, and incorporate herein, the following document(s), which may contain information from which Cellspin may ascertain the requested information: BYTEDANCE-CS-0003639 – BYTEDANCE-CS-0003700.

VENUE INTERROGATORY NO. 7:

As of the date of filing of the Original Complaint in this matter, please identify with specificity each employee, contractor or individual who works for ByteDance Ltd. (“BDL”), ByteDance Pte. Ltd. (“BDPL”), and TikTok Pte. Ltd. (“TTPL”) TikTok Inc. (“TTI”) and ByteDance Inc. and (“BDI”), or any subsidiaries of said companies, and TikTok U.S. Data Security Inc. (“USDS”) in Texas. For each such individual, please provide:

- (i) the name of each such individual;
- (ii) the city of residence for each such individual;
- (iii) the location where each such individual performs their job tasks;
- (iv) the job title of each such individual;
- (iv) the job description for each such individual; and
- (v) a description of the relevant knowledge possessed by each such individual.

RESPONSE TO VENUE INTERROGATORY NO. 7:

In addition to and without limiting the foregoing General Objections, which are incorporated by reference as though fully set forth herein, Defendants object to this Interrogatory to the extent it seeks to require more of Defendants than any obligation imposed by law. Defendants object to this Interrogatory as overly broad, unduly burdensome, oppressive, and disproportionate to the narrowed scope of venue discovery, particularly the issue of whether venue is clearly more convenient in this district. Defendants will only provide information relevant to the proper scope of venue discovery, which is information relevant to the accused functionality of the Accused Instrumentalities identified in Plaintiff’s Preliminary Disclosure of Infringement Contentions served on March 11, 2024. Defendants further object to this Interrogatory because it calls for information beyond the relevant geographic scope of this matter, namely the Eastern District of Texas.

Subject to and without waiving the foregoing General or Specific Objections, Defendants respond to this Interrogatory as follows:

Defendants incorporate by reference their response to Interrogatory No. 2. Pursuant to Rule 33(d), Defendants refer to, and incorporate herein, the following document(s), which may contain information from which Cellspin may ascertain the requested information: BYTEDANCE-CS-0003637.